

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

**LA UNION DEL PUEBLO ENTERO, SARAH
DOE, MARY DOE, JOHN DOE, AND JAMES
DOE.,**

Plaintiffs,

v.

GREGORY ABBOTT ET AL.,

Defendants.

CIVIL ACTION NO. 1:24-CV-270-DAE

STATE DEFENDANTS UNOPPOSED MOTION FOR SUBSTITUTION OF COUNSEL

State Defendants Gregory Abbott, in his official capacity of Governor of Texas, Steven C. McCraw, in his official capacity as Director of Texas Department of Public Safety, Warren K. Paxton, in his official capacity as the Texas Attorney General (collectively, “State Defendants”) file this this Unopposed Motion for Substitution of Counsel and would respectfully show the following:

Garrett Greene has accepted a position within the Office of the Attorney General of Texas but outside of the Special Litigation Division handling this litigation. State Defendants respectfully request a substitution of counsel in this case and further request that Mr. Greene be permitted to withdraw as State Defendants’ counsel and for the following attorney be substituted in his place as co-counsel.

Wade Johnson
Tex. State Bar No. 24062197
Office of the Attorney General of Texas
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548

This matter is not currently set for trial. The withdrawal and substitution of counsel requested herein is not sought for purposes of delay, but so that justice may be done.

Accordingly, State Defendants respectfully request that this Court enter an Order permitting Garrett Greene to withdraw from this case and substituting Wade Johnson as co-counsel with Ryan G. Kercher, Kathleen Hunker, and David Bryant.

Date: March 21, 2025

Respectfully submitted.

KEN PAXTON
Attorney General

DAVID BRYANT
Senior Special Counsel
Tex. State Bar No. 03281500

BRENT WEBSTER
First Assistant Attorney General

/s/Wade Johnson
WADE JOHNSON
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COUNSEL FOR STATE DEFENDANTS

CERTIFICATE OF CONFERENCE

I certify that on March 20, 2025, I conferred via email with counsel for Plaintiffs regarding the relief requested in this motion. Counsel for Plaintiffs stated that they do not oppose this Motion.

/s/Wade Johnson
WADE JOHNSON

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on March 21, 2025 and that all counsel of record were served by CM/ECF.

/s/Wade Johnson
WADE JOHNSON